

Exhibit “L”

Declaration of Stephen M. Gaffigan

1 Krieg, Keller, Sloan, Reilley & Roman LLP
2 114 Sansome Street, Suite 400
3 San Francisco, California 94104-3839
Telephone: (415) 249-8330
Facsimile: (415) 249-8333

4 Attorneys for PLAINTIFF
CHANEL, INC., a New York Corporation
5

6 THE UNITED STATES DISTRICT COURT
7 FOR THE NORTHERN DISTRICT OF CALIFORNIA

8 CHANEL, INC., a New York corporation, } Case No. CV 07-03592-EMC
9 Plaintiff, }
10 v. }
11 CASONDRA TSHIMANGA a/k/a }
12 CASONDRA SMITH a/k/a }
13 CASONDRA SATCHER a/k/a C. }
MAYFIELD a/k/a ANNE LLOYD et al., }
14 Defendants. }
15 }
16 }
17 }
18 }
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20 }
21 }
22 }
23 }
24 }
25 }
26 }

**DECLARATION OF
STEPHEN M. GAFFIGAN IN
SUPPORT OF CHANEL,
INC.'S MOTION FOR ENTRY
OF DEFAULT JUDGMENT
AGAINST CASONDRA
TSHIMANGA.**

DATE:
TIME:
PLACE:

I, Stephen M. Gaffigan, declare and state as follows:

1. I am an attorney for the Plaintiff Chanel, Inc. ("Chanel"). I am duly
authorized and licensed to practice law before all courts in the State of Florida, the
Southern and Middle District Courts of Florida, the Eastern District of Michigan,
the Eleventh Circuit Court of Appeals, and the Federal Circuit Court of Appeals. I
am personally knowledgeable of the matters set forth in this Declaration and, if
called upon to do so, I could and would competently testify to the following facts in

1 support of Chanel's Motion for Entry of Default Judgment against Defendant
2 Casondra Tshimanga a/k/a Casondra Smith a/k/a Casondra Satcher a/k/a C.
3 Mayfield a/k/a Anne Lloyd d/b/a HandbagOutpost.com d/b/a DesignerOutpost.net
4 d/b/a Handbagsluxery.com d/b/a Bay Electronics ("Tshimanga" or "Defendant").
5

6 **RE: REQUEST FOR ATTORNEY FEES**
7

8 2. I am engaged to coordinate Chanel's nationwide anti-counterfeiting
9 efforts. I have been an attorney practicing in Florida for 13 years. I have extensive
10 litigation experience.
11

12 3. On behalf of Chanel, I began working on the investigation leading up
13 to this action in April 2007.
14

15 4. From April 2007, through the present, the total hours I have billed
16 Chanel are 13.5 hours at a rate of \$350.00. To date, I have been paid fees in the
17 amount of \$4,725.00.
18

19 5. Some hours in this matter were discounted as a professional courtesy.
20

21 6. All attorney time incurred in this matter relates to the gathering of
22 investigative information, preparation of documents and pleadings, and other
23 litigation related legal services. I made every reasonable effort to minimize hours
24 spent on the case, and the fee requested is equal to or below the amount spent on
25 similar past cases
26

1 7. My billing rate for intellectual property litigation is \$350.00 per hour,
2 which I believe, is equal to or less than the prevailing rate for intellectual property
3 attorneys in the Northern District of California where this action was filed.
4

5 **RE: REQUEST FOR COSTS**

6 8. I am one of the attorneys under whose direction these costs were
7 incurred in the investigation and prosecution of this action.
8

9 9. To the best of my knowledge and belief, \$350.00 in costs were
10 necessarily incurred by my office in this matter for filing fees.
11

12 10. To the best of my knowledge and belief, \$150.00 in costs were
13 necessarily incurred by my office in this matter for service of process for
14 Tshimanga. A true and correct copy of the process service invoice is attached
15 hereto as Exhibit "1."

16 11. Total costs incurred by Chanel, Inc., in the prosecution of this action
17 are \$500.00.
18

19 I declare under penalty of perjury under the laws of the United States of
20 America that the foregoing is true and correct.
21

22 **FURTHER DECLARANT SAYETH NAUGHT.**
23

24 Dated this 16th day of January 2008.

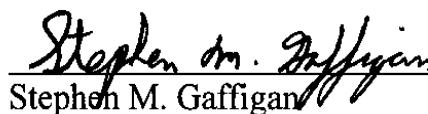
25 
26 Stephen M. Gaffigan

Exhibit “1”



Case 3:07-cv-03592-SC

LEGAL SERVICES

www.abclegal.com

Document 18-14 Filed 03/14/2008

STATEMENT

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REMITTANCE MEMO

FEDERAL I.D.# 91-1153514

633 Yesler Way
Seattle, WA 98104
(206) 682-1675 or (206) 623-8771
BELLVEU (425) 455-0102 OLYMPIA (360) 754-6595
EVERETT (425) 258-4591 TACOMA (253) 383-1791
WEBSITE www.abclegal.com

11/30/2007

GAFFIGAN, STEPHEN M (

YOUR ACCT. NO. 70-0104118

YOUR ACCT. NO. STMT. DATE

70-0104118 11/30/07

GAFFIGAN, STEPHEN M (PFI)
312 SE 17TH ST, 2ND FLOOR
FORT LAUDERDALE, FL 33316

PLEASE REMIT TO:

ABC-LEGAL SERVICES
INC.633 Yesler Way
Seattle, Washington 98104*Reprint invoices and proof of services from www.abclegal.com*

DATE	INVOICE					
11/08/07	4826728-IN					
11/06/07	4882752-IN		125.00	4826728-IN		125.00
11/27/07	4893304-IN		125.00	4882752-IN		125.00
11/06/07	4899394-IN		150.00	4893304-IN		150.00
11/08/07	4969222-IN		150.00	4899394-IN		150.00
11/16/07	4969226-IN		75.00	4969222-IN		75.00
11/16/07	4969227-IN		75.00	4969226-IN		75.00
11/21/07	4973598-IN		75.00	4969227-IN		75.00
11/06/07	4993590-IN	TSHIMANGA, CASO	100.00	4973598-IN		100.00
11/07/07	4993591-IN		150.00	4993590-IN		150.00
11/21/07	4993725-IN		175.00	4993591-IN		175.00
11/28/07	4993726-IN		75.00	4993725-IN		75.00
11/28/07	4993728-IN		75.00	4993726-IN		75.00
11/21/07	4993859-IN		75.00	4993728-IN		75.00
11/21/07	4993860-IN		175.00	4993859-IN		175.00
11/21/07	4993861-IN		75.00	4993860-IN		75.00
11/21/07	4993862-IN		75.00	4993861-IN		75.00
11/28/07	5030010-IN		75.00	4993862-IN		75.00
			142.25	5030010-IN		142.25

1,967.25	0.00	0.00	0.00	BALANCE DUE	1,967.25	AMOUNT OF PAYMENT
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IENT	OVER 30 DAYS	OVER 60 DAYS	OVER 90 DAYS
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STATUS OF ACCOUNT

TERMS: NET 30 DAYS

Your Finance Charge is computed by a single periodic rate of 1 1/2% per month (minimum charge \$.50) which is an ANNUAL PERCENTAGE OF 18%.